

STEVEN W. MYHRE
Acting United States Attorney for District of Nevada
Nevada Bar No. 9635
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
Nevada Bar No. 1925
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Facsimile: 702-388-6787
Email: Daniel.Hollingsworth@usdoj.gov
Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:13-CR-267-KJD-(PAL)
)	
Plaintiff,)	United States of America's Unopposed
)	Motion to Extend Time to File its Replies to
v.)	Mosley's Response (ECF No. 179) to the
)	Government's Motions Regarding the
CARMEN DENISE MOSLEY,)	Criminal Forfeiture Money Judgment (ECF
)	Nos. 173 and 177)
Defendant.)	(First Request)

The United States of America respectfully moves this Court for an Order extending the time for the United States to file its replies to the response (ECF No. 179) to the motions (ECF Nos. 173 and 177) regarding the criminal forfeiture money judgment pursuant to the Excessive Fines Clause of the Eighth Amendment and *Honeycutt*. This motion is the first request for an extension of time to file the replies because of the undersigned counsel's heavy caseload in addressing the *Honeycutt* issues in all pending criminal cases. The deadline for filing the replies is September 7, 2017. The United States requests a two-week extension of the deadline until September 22, 2017.

The grounds for extending the time are as follows.

Angela Dows, counsel for Carmen Denise Mosley (Mosley), was contacted on September 6, 2017, and agreed to the extension of time.

/ / /

1 The Motion regarding the Excessive Fines Clause of the Eighth Amendment as Applied to
2 the Final Forfeiture Order with a Criminal Forfeiture Money Judgment (ECF No. 173) was filed on
3 July 28, 2017, and the Motion regarding Honeycutt's Holdings on Mosley's Criminal Forfeiture
4 Money Judgement of \$2,145,014.50 (ECF No. 177) was filed on August 8, 2017. Mosley filed her
5 Response to the Government's Motions (ECF No. 179) on August 31, 2017. The deadline for filing
6 the Replies to Mosley's Response is September 7, 2017. Undersigned counsel has a large caseload
7 and has been unable to complete the replies on the original deadline.

8 This Motion is not submitted solely for the purpose of delay or for any other improper
9 purpose.

10 This Court should grant an extension of time to, and including, September 22, 2017.

11 DATED this 6th day of September, 2017.

12 Respectfully submitted,

13 STEVEN W. MYHRE
14 Acting United States Attorney

15 /s/ Daniel D. Hollingsworth
16 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

17
18
19 IT IS SO ORDERED:

20
21
22 
23 UNITED STATES DISTRICT JUDGE

24 DATED: 9/8/2017
25
26